

<i>SERFF Tracking Number:</i>	<i>AFDL-127608863</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>American Public Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>49681</i>
<i>Company Tracking Number:</i>	<i>APL UNLIMITED CANCER RATE INCREASE</i>		
<i>TOI:</i>	<i>H071 Individual Health - Specified Disease - Limited Benefit</i>	<i>Sub-TOI:</i>	<i>H071.002A Dread Disease - Cancer Only</i>
<i>Product Name:</i>	<i>APL Unlimited Cancer Rate Increase</i>		
<i>Project Name/Number:</i>	<i>APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase</i>		

Filing at a Glance

Company: American Public Life Insurance Company

Product Name: APL Unlimited Cancer Rate Increase SERFF Tr Num: AFDL-127608863 State: Arkansas

TOI: H071 Individual Health - Specified Disease - Limited Benefit SERFF Status: Closed-Approved State Tr Num: 49681

Sub-TOI: H071.002A Dread Disease - Cancer Only Co Tr Num: APL UNLIMITED CANCER RATE INCREASE State Status: Approved-Closed

Filing Type: Rate Reviewer(s): Rosalind Minor, Donna Lambert
Disposition Date: 09/20/2011

Authors: Shari Vick, Melissa Mahanes, Ashlie Snyder, Ann Hobson

Date Submitted: 09/01/2011

Disposition Status: Approved

Implementation Date Requested: On Approval

Implementation Date: 10/20/2011

State Filing Description:

General Information

Project Name: APL Unlimited Cancer Rate Increase
Project Number: APL Unlimited Cancer Rate Increase
Requested Filing Mode: Review & Approval
Explanation for Combination/Other:
Submission Type: New Submission
Overall Rate Impact:

Status of Filing in Domicile: Not Filed

Date Approved in Domicile:

Domicile Status Comments:

Market Type: Individual

Individual Market Type:

Filing Status Changed: 09/20/2011

State Status Changed: 09/20/2011

Created By: Ann Hobson

Corresponding Filing Tracking Number:

Deemer Date:

Submitted By: Ashlie Snyder

Filing Description:

American Fidelity Assurance Company is filing the above listed rate increase for approval with your Department on behalf of American Public Life Insurance Company. A letter of authorization is enclosed.

Enclosed for submission is information concerning an increase in premium rates for the Unlimited Cancer Policies and optional riders, where applicable, as listed in the Actuarial Memorandum. These forms have been previously approved

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by your Department.

The policy is guaranteed renewable.

The effective date of this proposed increase will be no sooner than January 1, 2012, or the next plan date for those individuals.

I hereby certify that to the best of my knowledge the rates submitted herewith is in compliance in all respects with the provisions of the insurance laws, rules and regulations of your state and such rates contain no provisions previously disapproved by the Department.

Thank you for your assistance with this matter. If you have any questions, please feel free to call me at 1-800-654-8489, extension 7782. My email address is shari.vick@af-group.com.

Company and Contact

Filing Contact Information

Ashlie Snyder, Compliance Analyst I ashlie.snyder@af-group.com
 2000 Classen 800-654-8489 [Phone] 5255 [Ext]
 Oklahoma City, OK 73160 405-523-5793 [FAX]

Filing Company Information

American Public Life Insurance Company CoCode: 60801 State of Domicile: Oklahoma
 2305 Lakeland Drive Group Code: 330 Company Type: LAH
 Flowood, MS 39232 Group Name: State ID Number:
 (601) 936-2157 ext. [Phone] FEIN Number: 64-0349942

Filing Fees

Fee Required? Yes
 Fee Amount: \$50.00
 Retaliatory? Yes
 Fee Explanation: \$50 - Rate Increase
 Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
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SERFF Tracking Number:	AFDL-127608863	State:	Arkansas
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American Public Life Insurance Company	\$50.00	09/01/2011	51193146

SERFF Tracking Number: AFDL-127608863 State: Arkansas

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Product Name: APL Unlimited Cancer Rate Increase

Project Name/Number: APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved	Donna Lambert	09/20/2011	09/20/2011

Objection Letters and Response Letters

Objection Letters				Response Letters		
Status	Created By	Created On	Date Submitted	Responded By	Created On	Date Submitted
Pending Industry Response	Rosalind Minor	09/14/2011	09/14/2011	Ashlie Snyder	09/16/2011	09/16/2011
Pending Industry Response	Rosalind Minor	09/07/2011	09/07/2011	Ann Hobson	09/07/2011	09/07/2011

Amendments

Schedule	Schedule Item Name	Created By	Created On	Date Submitted
Supporting Document	Health - Actuarial Justification	Ashlie Snyder	09/06/2011	09/06/2011

Filing Notes

Subject	Note Type	Created By	Created On	Date Submitted
Review	Note To Reviewer	Ashlie Snyder	09/01/2011	09/01/2011

SERFF Tracking Number: AFDL-127608863 State: Arkansas

Filing Company: American Public Life Insurance Company State Tracking Number: 49681

Company Tracking Number: APL UNLIMITED CANCER RATE INCREASE

TOI: H071 Individual Health - Specified Disease - Limited Benefit Sub-TOI: H071.002A Dread Disease - Cancer Only

Product Name: APL Unlimited Cancer Rate Increase

Project Name/Number: APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase

Disposition

Disposition Date: 09/20/2011

Implementation Date: 10/20/2011

Status: Approved

Comment: We have approved a 10% level rate increase on your submission. The approval is subject to the following conditions:

1. Rate increases will not be given prior to the first annual anniversary date of any policy.
2. After the first annual anniversary date of any policy, increases will not be given more frequently than once in a twelve (12) month period.
3. All increases in rates, other than a change in age or an individual moving to another geographical area, must be submitted to our Department for approval

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
American Public Life Insurance Company	15.000%	15.000%	\$949	1	\$6,324	15.000%	15.000%

SERFF Tracking Number: AFDL-127608863 State: Arkansas

Filing Company: American Public Life Insurance Company State Tracking Number: 49681

Company Tracking Number: APL UNLIMITED CANCER RATE INCREASE

TOI: H071 Individual Health - Specified Disease - Sub-TOI: H071.002A Dread Disease - Cancer Only
Limited Benefit

Product Name: APL Unlimited Cancer Rate Increase

Project Name/Number: APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document (revised)	Health - Actuarial Justification		No
Supporting Document	Health - Actuarial Justification		No
Supporting Document	Health - Actuarial Justification		No
Supporting Document	Thrid-Party Authorization		No

SERFF Tracking Number: AFDL-127608863 State: Arkansas
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Product Name: APL Unlimited Cancer Rate Increase
Project Name/Number: APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 09/14/2011
Submitted Date 09/14/2011

Respond By Date

Dear Ashlie Snyder,

This will acknowledge receipt of the captioned filing.

Objection 1

- Health - Actuarial Justification (Supporting Document)

Comment:

Your response to my objection letter requested that we reconsider your original request for a 15% rate increase. My supervisor, Dan Honey, Deputy Commissioner, also reviewed your request.

Based on our comments in my Objection Letter, we again request that you accept the 10% increase in lieu of disapproval.

We appreciate your cooperation in this matter.

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

Please feel free to contact me if you have questions.

Sincerely,

Rosalind Minor

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Filing Company: American Public Life Insurance Company State Tracking Number: 49681
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Response Letter

Response Letter Status Submitted to State
Response Letter Date 09/16/2011
Submitted Date 09/16/2011

Dear Donna Lambert,

Comments:

Response 1

Comments: We will accept the 10% increase. I have attached the new actuarial memorandum reflecting the 10%..

Related Objection 1

Applies To:

- Health - Actuarial Justification (Supporting Document)

Comment:

Your response to my objection letter requested that we reconsider your original request for a 15% rate increase. My supervisor, Dan Honey, Deputy Commissioner, also reviewed your request.

Based on our comments in my Objection Letter, we again request that you accept the 10% increase in lieu of disapproval.

We appreciate your cooperation in this matter.

Changed Items:

Supporting Document Schedule Item Changes

Satisfied -Name: Health - Actuarial Justification

Comment:

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,

SERFF Tracking Number: *AFDL-127608863* *State:* *Arkansas*
Filing Company: *American Public Life Insurance Company* *State Tracking Number:* *49681*
Company Tracking Number: *APL UNLIMITED CANCER RATE INCREASE*
TOI: *H071 Individual Health - Specified Disease - Limited Benefit* *Sub-TOI:* *H071.002A Dread Disease - Cancer Only*
Product Name: *APL Unlimited Cancer Rate Increase*
Project Name/Number: *APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase*
Ann Hobson, Ashlie Snyder, Melissa Mahanes, Shari Vick

SERFF Tracking Number: AFDL-127608863 State: Arkansas
Filing Company: American Public Life Insurance Company State Tracking Number: 49681
Company Tracking Number: APL UNLIMITED CANCER RATE INCREASE
TOI: H071 Individual Health - Specified Disease - Sub-TOI: H071.002A Dread Disease - Cancer Only
Limited Benefit
Product Name: APL Unlimited Cancer Rate Increase
Project Name/Number: APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase

Objection Letter

Objection Letter Status Pending Industry Response
Objection Letter Date 09/07/2011
Submitted Date 09/07/2011

Respond By Date

Dear Ashlie Snyder,

This will acknowledge receipt of the captioned filing.

Objection 1

- Health - Actuarial Justification (Supporting Document)

Comment:

It is the primary mission of the Arkansas Insurance Department to protect consumers.

Given the current state of the economy, the fact that this block of business has continually received rate increases and the impact that another increase will have at this time, we will consider no more than a 10% increase. If you wish to accept the 10%, please submit the updated rates reflecting the 10% increase.

We appreciate your understanding and cooperation.

A.C.A. 23-79-109(1)-(5) sets forth the procedure by which filings may be deemed approved upon the expiration of certain time periods with no affirmative action by the commissioner. If the commissioner determines that additional information is needed to make a decision regarding approval, such request for information will be made to the company. The filing will not be considered complete until said additional information is received. The time periods set forth in this statute will not begin to run until the filing is complete.

Please feel free to contact me if you have questions.

Sincerely,

Rosalind Minor

SERFF Tracking Number: AFDL-127608863 State: Arkansas
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Response Letter

Response Letter Status Submitted to State
Response Letter Date 09/07/2011
Submitted Date 09/07/2011

Dear Donna Lambert,

Comments:

Response 1

Comments: We certainly appreciate your position with regard to rate increases in the current economic environment. However, this block of business has an extremely high loss ratio and is affected by a medical trend in excess of the rate increase amount you have proposed. We are requesting 35% in other states due to the poor experience on this block of business, however, due to prior rate increase filings we have reduced our request in Arkansas to 15%. Policyholders have had opportunities in the past to limit highly inflationary benefits such as unlimited radiation and chemotherapy benefits, which would result in reduced medical trend and lower annual rate increases. We respectfully request that you reconsider our request which is equivalent to projected medical trend.

Related Objection 1

Applies To:

- Health - Actuarial Justification (Supporting Document)

Comment:

It is the primary mission of the Arkansas Insurance Department to protect consumers.

Given the current state of the economy, the fact that this block of business has continually received rate increases and the impact that another increase will have at this time, we will consider no more than a 10% increase. If you wish to accept the 10%, please submit the updated rates reflecting the 10% increase.

We appreciate your understanding and cooperation.

Changed Items:

No Supporting Documents changed.

SERFF Tracking Number: *AFDL-127608863* *State:* *Arkansas*
Filing Company: *American Public Life Insurance Company* *State Tracking Number:* *49681*
Company Tracking Number: *APL UNLIMITED CANCER RATE INCREASE*
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Project Name/Number: *APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase*

No Form Schedule items changed.

No Rate/Rule Schedule items changed.

Sincerely,
Ann Hobson, Ashlie Snyder, Melissa Mahanes, Shari Vick

SERFF Tracking Number: *AFDL-127608863* *State:* *Arkansas*
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Project Name/Number: *APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase*

Amendment Letter

Submitted Date: 09/06/2011

Comments:

We have corrected the typo and uploaded the revised actuarial memorandum. Thanks for your patience!

Changed Items:

Supporting Document Schedule Item Changes:

Satisfied -Name: Health - Actuarial Justification

Comment:

Arkansas.pdf

SERFF Tracking Number: *AFDL-127608863* *State:* *Arkansas*
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Note To Reviewer

Created By:

Ashlie Snyder on 09/01/2011 02:33 PM

Last Edited By:

Ashlie Snyder

Submitted On:

09/01/2011 02:33 PM

Subject:

Review

Comments:

Our actuaries have found a typographical error in the memorandum, so could you please wait to review this until I can get the revised one uploaded. Thank you for your consideration of this request!

SERFF Tracking Number: AFDL-127608863 State: Arkansas

Filing Company: American Public Life Insurance Company State Tracking Number: 49681

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Product Name: APL Unlimited Cancer Rate Increase

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Post Submission Update Request Submitted On 09/16/2011

Status: Submitted

Created By: Ashlie Snyder

General Information:

Field Name	Requested Change	Prior Value
Domicile Status Comments		
Explanation for Combination/Other		
Corresponding Filing Tracking Number		

Company Rate Information:

Company Name:American Public Life Insurance Company

Field Name	Requested Change	Prior Value
Overall % Indicated Change	10.000%	15.000%
Overall % Rate Impact	10.000%	15.000%
Written Premium Change for this Program	\$632	\$949
Maximum %Change (where required)	10.000%	15.000%
Minimum %Change (where required)	10.000%	15.000%

SERFF Tracking Number: AFDL-127608863 State: Arkansas

Filing Company: American Public Life Insurance Company State Tracking Number: 49681

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Product Name: APL Unlimited Cancer Rate Increase

Project Name/Number: APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase

Post Submission Update Request Processed On 09/07/2011

Status: Allowed

Created By: Ashlie Snyder

Processed By: Rosalind Minor

Comments:

Rate Information:

Field Name	Requested Change	Prior Value
Effective Date of Last revision	01/01/2011	10/29/2010

Company Rate Information:

Company Name:American Public Life Insurance Company

Field Name	Requested Change	Prior Value
Written Premium Change for this Program	\$949	\$464
Written Premium for this Program	\$6324	\$3093

SERFF Tracking Number:	AFDL-127608863	State:	Arkansas
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Project Name/Number:	APL Unlimited Cancer Rate Increase/APL Unlimited Cancer Rate Increase		

Rate Information

Rate data applies to filing.

Filing Method:	SERFF
Rate Change Type:	Increase
Overall Percentage of Last Rate Revision:	15.000%
Effective Date of Last Rate Revision:	01/01/2011
Filing Method of Last Filing:	SERFF

Company Rate Information

Company Name:	Overall % Indicated Change:	Overall % Rate Impact:	Written Premium Change for this Program:	# of Policy Holders Affected for this Program:	Written Premium for this Program:	Maximum % Change (where required):	Minimum % Change (where required):
American Public Life Insurance Company	15.000%	15.000%	\$949	1	\$6,324	15.000%	15.000%

SERFF Tracking Number: AFDL-127608863 State: Arkansas
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Supporting Document Schedules

	Item Status:	Status Date:
Satisfied - Item: Health - Actuarial Justification Comments: Attachment: Arkansas.pdf		

	Item Status:	Status Date:
Satisfied - Item: Thrid-Party Authorization Comments: Attachment: 2011_Authorization.pdf		



American Public Life Insurance Company

A member of the American Fidelity Group.

January 10, 2011

NAIC Number: 60801
FEIN Number: 64-0349942

To Whom It May Concern:

American Fidelity Assurance Company, located at 2000 N. Clasen Boulevard, Oklahoma City, Oklahoma, 73125, is hereby authorized to submit forms for approval to the Department of Insurance on behalf of American Public Life Insurance Company. Changes to the forms, as may be necessary to gain approval, are included in this authorization.

Sincerely,

Alex M. Bagby, ASA, MAAA
Vice President & Chief Risk Officer

SERFF Tracking Number: AFDL-127608863 State: Arkansas

Filing Company: American Public Life Insurance Company State Tracking Number: 49681

Company Tracking Number: APL UNLIMITED CANCER RATE INCREASE

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Product Name: APL Unlimited Cancer Rate Increase

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Superseded Schedule Items

Please note that all items on the following pages are items, which have been replaced by a newer version. The newest version is located with the appropriate schedule on previous pages. These items are in date order with most recent first.

Creation Date:	Schedule	Schedule Item Name	Replacement Creation Date	Attached Document(s)
09/06/2011	Supporting	Health - Actuarial Justification Document	09/16/2011	Arkansas.pdf (Superceded)
08/31/2011	Supporting	Health - Actuarial Justification Document	09/06/2011	Arkansas.pdf (Superceded)